

3/11/94

HRE-8J

CERTIFIED MAIL RETURN
RECEIPT REQUESTED

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut 06492-7530

Re: Administrative Order on Consent
Franklin Power Products/
Amphenol Corporation
IND 044 587 848

Dear Mr. Waldo:

This letter is in follow-up to the February 24, 1994, telephone conference of Franklin Power Products/Amphenol and the United States Environmental Protection Agency (U.S. EPA) representatives. U.S. EPA concludes that additional data is required to complete the RCRA Facility Investigation (RFI) and pursuant to the terms of Section VII 2.a.(4)(c)(iii) of the Administrative Order on Consent (AOC), dated November 27, 1990, U.S. EPA directs Respondents to perform additional work as prescribed below.

All samples shall be collected in accordance with the methodologies as set forth in U.S. EPA's letter to Respondents dated January 21, 1994. Respondents shall collect ground-water samples at the approximate locations numbered 1, 2, and 3 in Attachment I. At least one soil sample shall also be collected at these same locations at depth intervals about midway between the base of the sanitary sewer line and the water table. All samples shall be analyzed for volatile organic compounds (VOCs), cyanide, and the list of metals previously applied to groundwater samples. The sampling/analysis results shall be included in a revised RFI report which shall be submitted within sixty (60) days of receipt of this letter.

In our recent telephone conference Respondents once again proposed an alternative to collecting samples at the locations as directed in our December 14, 1993, and January 21, 1994, letters. However, in addition to proposing collecting groundwater samples for VOC analysis from the Hurricane Creek stream bed during no-flow conditions, the Respondents have proposed to proceed with the Corrective Measures Study (CMS) on a parallel tract while awaiting for the appropriate conditions at Hurricane Creek. Prior to

) approving such a proposal, we are requesting that Respondents submit such proposal in writing which would specify the locations to be sampled and an agreement to proceed with the CMS while waiting for the appropriate conditions. The proposal shall include at least one sampling location near the drainage ditch down stream of the storm drain outfall. The samples shall be analyzed for VOCs, cyanide, and the groundwater metal list.

If a parallel tract were to be taken for the additional sampling in the Hurricane Creek area, the results for either sampling at locations as directed in our previous letters, or the results of Respondents' proposed alternative sampling, if approved by U.S. EPA, shall be included in the Corrective Measures Study draft report that is required by the AOC.

To satisfy the requirements for the ecological risk assessment the following information is required.

- 1. Provide a written statement from the U.S. Fish and Wildlife Service (F&WS), Bloomington Office, confirming that the endangered species, the Indiana Bat, has not been identified in the vicinity of the site.
- 2. Provide a discussion which includes appropriate references, of VOC concentrations in Hurricane Creek stream water and sediment, and their subchronic, chronic and lethal effects on past or present species supported by Hurricane Creek. Due to the variation in Hurricane Creek stream flow and variance of contaminant input to the storm drain, Respondents should use the worst case assumptions to establish historical contaminant concentrations in Hurricane Creek.
- 3. If these exercises do not establish that the impact of VOCs was minimal, Respondents shall perform, in accordance with U.S. EPA's guidance, a qualitative biosurvey to evaluate such impact. The qualitative assessment shall establish as to whether such species are known to exist in similar habitat and whether such species are absent or present in Hurricane Creek. References shall be provided to support the statement that there is no bioaccumulation risk at the site.
- 4. The risk assessment data, as needed to satisfy the above requirements, shall be included in the revised RFI report due within sixty (60) days of receipt of this letter.

In our recent telephone conference, U.S. EPA encouraged Respondents to employ an interim corrective measure to reduce the discharge of contaminated water to Hurricane Creek by the storm drain at the site. A temporary diversion of the contaminated storm drain water to a storage pond to enhance volatilization of the VOCs, was suggested. U.S. EPA again encourages Respondents to employ such measure to mitigate the storm drain impact on Hurricane Creek.

Questions on legal matters should be addressed to Joseph Cooley at (312) 886-5313, questions on the ecological risk assessment addressed to Diane Sharrow at (312) 886-6199, and all other issues addressed to William Buller at (312) 886-4568.

Sincerely yours,

Kevin M. Pierard, Chief
Technical Enforcement Section #1

cc: J. Michael Jarvis, Franklin Power Products
James Keith, WW Engineering and Science

bcc: Joe Cooley, (ORC)
Diane Sharrow, (REB)

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CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	AB 10 MAR 94		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
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